

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
AT MARTINSBURG**

**HOMELAND TRAINING CENTER, LLC,
A Tennessee Limited Liability Company,**

Plaintiff,

v.

CIVIL ACTION NO: 3:07-cv-160

**SUMMIT POINT AUTOMOTIVE RESEARCH
CENTER, a West Virginia Limited Liability
Company, individually and in its capacity as
Trustee of the William Scott Inter Vivos Trust,
and the WILLIAM SCOTT INTER VIVOS
TRUST,**

Defendants/Third-party Plaintiffs,

v.

HOMELAND SECURITY CORPORATION,

Third-party Defendant.

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that Plaintiff/Third Party Defendant, by counsel, and by agreement with opposing counsel, will take the deposition of **Peter McDonald**, at the office of Richard McCune, Esquire, located at 115 West King Street, Martinsburg, WV 25401 on Friday, October 15, 2010, commencing at **9:00 A.M.**, at which time and place the deponent is notified to appear and take part in said deposition, bringing with him the following:

1. A current copy of his curriculum vitae and a complete and updated list of previous cases in which he has testified;
2. his complete file, (including any handwritten notes) regarding this matter;
3. copies of any and all correspondence (including e-mails) from counsel for

SPARC/Trust regarding this matter;

4. copies of any and all documents, materials and information, in any form or format, which are in his possession or which he can readily obtain, that he reviewed regarding the subject matter of this litigation;
5. copies of any and all documents, materials and information, in any form or format, which are in his possession or which he can readily obtain, supporting any other opinions or conclusions he is expected to offer at the trial of this matter.

HOMELAND TRAINING CENTER, LLC,

By /s/ J.H. Mahaney
Of Counsel

J.H. Mahaney, Esquire
(West Virginia Bar Number 6993)
J. Jarrod Jordan, esquire
(West Virginia Bar Number 10622)
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he served the foregoing "*Notice of Deposition of Peter McDonald*", by electronic filing using the CM/ECF System, and by mailing a complete copy to all counsel of record, postage prepaid, in the regular course of the United States Mail, on the 8th day of October 2010 to:

Peter L. Chakmakian
108 North George St.
Charles Town, WV 25414

Wm. Richard McCune, Jr.
115 West King St.
Martinsburg, WV 25401

_____/s/ J.H. Mahaney_____